

EXHIBIT 1

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

SHAMARA KING, on behalf of herself : CIVIL ACTION
and all others similarly situated, :
Plaintiffs, :
vs. :
GENERAL INFORMATION SERVICES, :
INC., :
Defendant. : NO. 2:10-cv-06850

11 Tuesday, August 28, 2012

Videotape Deposition of SHAMARA T. KING, taken pursuant to notice at the law office of Francis & Mailman, P.C., Land Title Building, 100 South Broad Street, 19th Floor, Philadelphia, Pennsylvania, on the above date, beginning at approximately 9:30 a.m., before Charles P. Carmody, Federally Approved, Registered Professional Reporter and Notary Public.

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SHAMARA KING vs. GENERAL INFORMATION SERVICES, INC.
Shamara T. King on 08/28/2012

Page 24

1 sued my client, General Information Services, because
2 they -- these were background checks that they had run
3 on you.

4 A. Yes.

5 Q. And that background check revealed a criminal
6 record. I just want to go through the events
7 surrounding that criminal -- the criminal record. Can you
8 describe for me what happened?

9 A. In 2000?

10 Q. In 2- -- well, let me stop something. Do you only
11 have -- the criminal record that
12 GI reported was a 2000 record?

13 A. Yes.

14 Q. Do you have any other criminal history?

15 A. No.

16 Q. Okay. Can you describe for me what happened in
17 2000? What were the events that led to the arrests?

18 A. Yes. The events were, what it came down to
19 was that my cousin and some of his friends, they were,
20 you know, accused of stealing cars and whatnot,
21 whatever else they were doing. And I was -- I was
22 there with them -- with them, with my cousin, but I
23 didn't know, you know, what they were doing. So we was in my
24 car and the cops pulled us
25 over. And I come to find out that he had an MV record.

SHAMARA KING vs. GENERAL INFORMATION SERVICES, INC.
Shamara T. King on 08/28/2012

Page 25

1 So since I was with them, they arrested me also. And
2 we went to the interrogation room, and they were
3 interrogating me, and I was telling them that, you
4 know, I was just there with him meeting his friend, and
5 I didn't know what was going on. So they let me go,
6 but they kept him.

7 Q. Okay. And what happened next that you recall?

8 A. And then next after that, then I was getting
9 letters saying I had to appear in court and stuff. So I hired
10 me a lawyer, and my uncle and I
11 went down to the court, and they were -- my lawyer
12 didn't show. So -- but they still wanted to proceed. So the
13 District Attorney was telling me that,
14 you know, they had a lot of evidence against me, that
15 my cousin and his friends, they, you know, was
16 conspiring against me. And he was just telling me, you
17 know -- you know, I would go to jail, you know, if I
18 chose to go to court. So he said if I could just plead
19 guilty, I would get three months' probation, so... Now, at
20 that time, I never got in any trouble
21 and I didn't know what to do and I didn't want to go to
22 jail, so that's what I did at that time. But if I knew
23 that I would have a record all these years, I would
24 have took my chances and went to court.

25 Q. Okay. So as I understand it, you were charged with

SHAMARA KING vs. GENERAL INFORMATION SERVICES, INC.
Shamara T. King on 08/28/2012

Page 26

1 ten or eleven different counts?

2 A. Yeah.

3 Q. Okay. And all of those counts arose out of that
4 same incident, shall we say, that you were -- you were
5 in the car with your cousin and you were arrested, and
6 that resulted in these changes being brought against
7 you?

8 A. Yes.

9 Q. And what did you plead guilty to?

10 A. It was criminal conspiracy and theft by
11 taking.

12 Q. And you received probation?

13 A. Yes.

14 Q. For how long?

15 A. It was three years.

16 Q. And did you satisfy the terms of that
17 probation?

18 A. Yes, yes.

19 Q. And the rest of the charges against you, what
20 happened to those, or what is your understanding of
21 what happened to those?

22 A. To my understanding, those are nol pros.

23 Q. And what do you understand "nol pros" to
24 mean?

25 A. Dismissed.

SHAMARA KING vs. GENERAL INFORMATION SERVICES, INC.
Shamara T. King on 08/28/2012

Page 33

1 know when.

2 A. It was either June or July of 2010.

3 Q. And did you meet with Mr. Hollander or
4 someone else in his -- at Community Legal Services?

5 A. I think it might have been someone else at
6 that time.

7 Q. Do you remember that person's name?

8 A. No. I think they was just taking -- taking
9 down my information, and then -- because, yeah, I never
10 met him, and then I received a call. He called me.

11 Q. About how long after you had the meeting did
12 Mr. Hollander call you?

13 A. A couple of days.

14 Q. Okay. You mentioned the United States Postal
15 Service. When was first time you applied for a job
16 with them?

17 A. I know it was 2010. I think it was March.

18 Q. Had you applied with them previously?

19 A. No.

20 Q. And how did you -- did the United States
21 Postal Service have an ad somewhere that they were
22 hiring?

23 A. No, I went on online.

24 Q. And did you -- how did you fill out the
25 application with the United States Postal Service? Was